

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of:)	
)	
Chariton Valley Telephone Corporation)	
)	CC Docket No. 96-45
Request for Review of a Decision of the)	
Universal Service Administrator.)	

Audit Number: Audit Report HC-FL-121, Follow-Up Audit to HC-2008-206.
SAC Number: 421864

**REQUEST FOR REVIEW BY CHARITON VALLEY TELEPHONE
CORPORATION OF DECISION OF THE UNIVERSAL SERVICE
ADMINISTRATOR**

Pursuant to 47 CFR 54.721, .722, and .723 of the Commission's Rules, Chariton Valley Telephone Corporation ("Chariton Valley") hereby submits this Request for *de novo* Review of a Decision of the Universal Service Administrator to the Federal Communications Commission, Wireline Competition Bureau.

Company Contact Information

Company:

Tina Jordan
Director of Finance
Chariton Valley Telephone Corporation
1213 E. Briggs Dr
Macon, MO 63552
(660) 395-9682
(660) 395-4403 FAX
tjordan@charitonvalley.com

Counsel for Company:

Craig S. Johnson
Mo Bar # 28179
Johnson & Sporleder, LLP
304 E. High St., Suite 200
P.O. Box 1670
Jefferson City, MO 65102
(573) 659-8734
(573) 761-3587 FAX
cj@cjlaw.com

Statement of Chariton Valley's Interest

Chariton Valley is a member owned cooperative with headquarters in Macon, Missouri. It has utilized itself and separate wholly owned operating affiliates to provide broadband and advanced telecommunications services in north central Missouri.

Chariton Valley provides wireline and wireless voice and broadband services, as well as analog video and IPTV, with fiber-to-the-premise service connections to over 55% of its customer base.

Chariton Valley was an early adopter of IP technology using IP network technology for its 300+ mile transport ring and fiber-to-the-premise service beginning in 2003. Chariton Valley was the first company in Missouri to use an IP fiber-to-the-premise network in Macon, Missouri. In 2012 Chariton Valley launched its new CDMA network with 3G EVDO high speed data service; partnered with Verizon on the LTE in Rural America project; and recently launched a 4G-LTE network. In sum, Chariton Valley has invested more than \$35,000,000 in installing fiber optic cable to 4800 landlines, and in installing 4G-LTE capability for over 5,000 wireless customers.

The Administrator's (USAC) decision would recover \$345,094 in Universal Service from future disbursements to Chariton Valley. USAC's decision, if not reversed, would result in loss of this high cost support. Such loss would have a significant adverse impact upon Chariton Valley's ongoing efforts to provide broadband and advanced communications services.

Statement of Facts

Chariton Valley has utilized and updated computer hardware networks and software to account for the investment, revenues, operating expenses, and separations required for its exchange access, local telecommunications, long distance telecommunications, broadband, internet access, wireless, video, and paging operations. Chariton Valley has allocated these costs between itself and its other affiliates, as required by the Commission's rules.

In November of 2008 the Commission's Inspector General announced that oversight audits of USF recipients, including Chariton Valley, would be conducted by USAC retained audit firms. In January of 2009 Chariton Valley was notified by USAC that it had engaged the services of a professional public accounting audit firm to audit high cost disbursements for the period July 1, 2007 to June 30, 2008. In February of 2009 Grant Thornton LLP (GT) notified Chariton Valley that it would conduct this audit. Attachment 1, pages 1-3.

On April 30, 2010 GT completed the audit, which included a finding that Chariton Valley had failed to use an appropriate method of cost allocation to distribute computer services expense as required by 47 CFR 64.901. Chariton Valley disagreed with GT's finding. Attachment 1, pages 6-7. GT reallocated computer service costs

and, based upon this reallocation, found Chariton Valley had over-recovered \$225,332 of high cost loop support and \$79,321 of interstate common line support, totaling \$304,653. Attachment 1, page 6.

On June 4, 2010 USAC issued a Management Response letter concurring with GT, which provided USAC would recover \$304,653 from future disbursements. See Attachment 1, page 8. On July 28 and 30, 2010 USAC issued its finalized report and response. Attachment 1, pages 9-10.

On September 27, 2010 Chariton Valley appealed these determinations to USAC. Attachment 2. Chariton Valley directed USAC's attention to the mandatory hierarchy of cost allocation preferences established by 47 CFR 64.901. Chariton Valley explained that its allocation complied with that hierarchy, that GT's reallocation did not comply, and that GT had inconsistently applied its non-compliant reallocation factor to only some of the cost categories in dispute. Attachment 2, pages 6-7.

On October 12, 2012, USAC issued its decision denying Chariton Valley's appeal. Attachment 3. USAC did not evaluate whether any component of Chariton Valley's total allocation formula complied with any of the ordered preferences set forth in the hierarchy of 47 CFR 64.901. Instead, USAC characterized the appeal to involve a single issue: whether "the auditors erred when applying a general allocation factor to its distribution of computer services to affiliates because a general allocation factor should only be used when a direct or indirect cost assignment is not available". USAC ignored the entirety of Chariton Valley's allocation method. USAC focused only upon one component of Chariton Valley's allocation.

USAC ruled that all components of Chariton Valley's entire allocation of computer service expenses were non-compliant solely because the "fourth preference" component of Chariton Valley's allocation utilized a "revenue/net income" factor. USAC ruled that GT's allocation using the "fifth preference" general allocation for all of the costs in dispute was correct.

USAC did agree with Chariton Valley that GT's general allocation factor had not been consistently applied to all cost categories. USAC reapplied GT's allocation to all computer service costs, and increased the recovery to be had from Chariton Valley's future disbursements by \$40,441 to a total of \$345,094.

In this appeal Chariton Valley will establish that USAC failed to analyze the propriety of Chariton Valley's entire allocation of computer service costs. Chariton Valley's allocation included components complying with Rule 64.901's priority of cost attribution that were higher in preference to GT's fifth preference general allocation. USAC failed to address the propriety of Chariton Valley's allocations made pursuant to the second, third, and fourth preferences. By implication, USAC ruled that all of the costs in question were common costs for which only the fifth preference of 64.901 could be used. USAC's decision is poor precedent. It encourages companies to deviate from the hierarchy the Commission established in Rule 64.901. Permitting the use of a fifth preference allocation instead of higher preferences would make computer service allocations less reliable.

Question Presented for Review

Did Chariton Valley correctly apply 47 CFR 64.901 in allocating computer costs?

Controlling Regulation

47 CFR 64.901 (“Rule 901”) is the controlling regulation as to cost allocation, and it provides as follows:

§ 64.901 Allocation of costs.

“(a) Carriers required to separate their regulated costs from nonregulated costs shall use the attributable cost method of cost allocation for such purpose.

(b) In assigning or allocating costs to regulated and nonregulated activities, carriers shall follow the principles described herein.

(1) Tariffed services provided to a nonregulated activity will be charged to the nonregulated activity at the tariffed rates and credited to the regulated revenue account for that service. Nontariffed services, offered pursuant to a section 252(e) agreement, provided to a nonregulated activity will be charged to the nonregulated activity at the amount set forth in the applicable interconnection agreement approved by a state commission pursuant to section 252(e) and credited to the regulated revenue account for that service.

(2) Costs shall be directly assigned to either regulated or nonregulated activities whenever possible.

(3) Costs which cannot be directly assigned to either regulated or nonregulated activities will be described as common costs. Common costs shall be grouped into homogeneous cost categories designed to facilitate the proper allocation of costs between a carrier's regulated and nonregulated activities. Each cost category shall be allocated between regulated and nonregulated activities in accordance with the following hierarchy:

(i) Whenever possible, common cost categories are to be allocated based upon direct analysis of the origin of the cost themselves.

(ii) When direct analysis is not possible, common cost categories shall be allocated based upon an indirect, cost-causative linkage to another cost category (or group of cost categories) for which a direct assignment or allocation is available.

(iii) When neither direct nor indirect measures of cost allocation can be found, the cost category shall be allocated based upon a general allocator computed by using the

ratio of all expenses directly assigned or attributed to regulated and nonregulated activities.

(4) The allocation of central office equipment and outside plant investment costs between regulated and nonregulated activities shall be based upon the relative regulated and nonregulated usage of the investment during the calendar year when nonregulated usage is greatest in comparison to regulated usage during the three calendar years beginning with the calendar year during which the investment usage forecast is filed.

(c) A telecommunications carrier may not use services that are not competitive to subsidize services subject to competition. Services included in the definition of universal service shall bear no more than a reasonable share of the joint and common costs of facilities used to provide those services.”

For purposes of this appeal, Chariton Valley has broken down Rule 901 into five descending preferences for cost allocation preferences, labeled “first” through “fifth”.¹

More Specific Facts, Argument as to Allocation Methodology

During the period under audit, USF beneficiary Chariton Valley Telephone Corporation (CVTC) provided broadband/internet access, local telecommunications, and exchange access services as an ILEC in 18 exchanges. Chariton Valley Communication Corporation (CVCC) provided cable TV and IPTV services. Chariton Valley Central Mobilphone (CVCMP) provided paging services. Chariton Valley Long Distance (CVLD) provided long distance and internet access services. Missouri RSA 5 Partnership d/b/a Chariton Valley Wireless Services (CVWS) provided wireless voice, broadband, internet access, and data services in MoRSA 5. Chariton Valley Telecom

¹ This hierarchy sets forth a **first** preference for tariffed or interconnection agreement rates for services provided to a nonregulated activity, a **second** preference for direct assignment of costs to regulated or nonregulated activities; where direct assignment is not available, such costs are to be considered “common costs” to be allocated by the remaining order of preference: **third** preference for direct analysis of the origin of the costs; **fourth** preference for indirect, cost-causative linkage to another cost category or categories for which direct assignment is available; and a final **fifth** preference, where neither direct nor indirect measures are found, utilizing a general allocator computed by using the ratio of all expenses directly assigned to regulated and nonregulated activities.

Corporation (TCOM) is a CLEC that provided broadband, internet access, local telecommunications, exchange access, and IPTV services via a fiber-to-the-premises network in Macon, Missouri.

The computer service costs at issue are costs associated with hardware, software and support used to generate end user and access billings, to record all financial transactions, and to issue financial statements. There are three categories of these costs: computer hardware, software, and variable costs. These costs are shared by Chariton Valley and its affiliates.

The computer hardware costs consisted of an Omnia Server, Oasis Workstations, a Financial Server, a CVTC Wide Area Network (WAN), a CVTC Local Area Network (LAN), a CVCMP LAN located in Columbia, a CVCMP LAN located in Jefferson City, and a Hardware Lease.

The software consisted of Omnia (non-wireless) software, Omnia Wireless software, Oasis software, Glenayra Paging Interface software, Internet Service Provisioning software, CLEC provisioning software, GSM Provisioning software, E-Group software, Accounting software, GEO software, Custom Programming software, and the Omnia/Solomon software.

Variable costs consisted of Omnia software ongoing vendor support charges, in-house and vendor Hardware support charges, software vendor support expenses, Omnia hardware vendor support charges, and Special Circuit Costs.

The audit period in question is July 1, 2007 to June 30, 2008. Chariton Valley annually revises its cost allocations. There were two revisions of Chariton Valley's allocation spreadsheet applied to costs during the audit period, the first applied in June of

2004, the second applied in July of 2005.² See the Tab denominated “Comp Services Sep 04” and the Tab denominated “Comp Services July 05” of the Excel Spreadsheet, Attachment 4.³

For the Jan 05-Jun 05 portion of the two year audit period, the Costs totaled \$1,436,351.12 annually. For the Jul 05-Dec 06 portion, the Costs totaled \$1,555,362.96 annually. The amounts of computer service costs, their breakout into the hardware costs, software costs, and variable cost categories were accepted by GT, and are not at issue. It is only the allocation of those costs that are at issue.

The GT audit report found Chariton Valley failed to use an appropriate method of cost allocation to distribute corporate computer and network service expenses to Chariton Valley Telephone Corporation (CVTC) which led to an over allocation of computer services (Account 6124) expenses to CVTC. GT stated:

“the Beneficiary used revenue and net income which are not appropriate cost drivers to allocate computer service expense to Chariton Valley Wireless Services, Chariton Valley Long Distance, Chariton Valley Telecom Corporation, Chariton Valley Communications Corporation and CVTC”.

² These dates predate the audit year due to the lag between cost submission and USF reimbursement.

³ Attachment 4 contains 5 separate worksheets or “tabs”, which set forth the details of the costs, Chariton Valley’s allocations, GT’s reallocations, and the quantification of the reductions in support resulting from GT’s reallocation. The first tab denominated “Quantification” is GT’s quantification of the support reduction resulting from its reallocations. GT’s reallocations for the first and second parts of the audit period are set forth in the fourth and fifth tabs, “Jan 05-Jun 05” and “Jul 05-Dec06” respectively. The second tab “Comp Services Sep 04” contains Chariton Valley’s allocation applied during the first part of the audit period. The third tab “Comp Services July 05” contains Chariton Valley’s allocation applied during the second part of the audit period.

Chariton Valley disagrees with GT's conclusion, as later adopted by USAC.

Chariton Valley was diligent in following Rule 901. Chariton Valley followed the hierarchy of allocations set forth in 47 CFR 64.901. Chariton Valley applied the rule in the order of the principles for assigning costs. GT and USAC's findings are an incorrect application of the rule, displaying a lack of understanding of the rule, and of Chariton Valley's entire allocation methodology.

It is necessary to understand Chariton Valley's entire allocation methodology in order to understand which Rule 901 preferences were being applied to which costs.

First Preference for tariffed or interconnection agreement rates

Rule 901 contains a first preference for utilizing rates set by the state public utility commission in either a tariff or a Section 252 interconnection agreement. None of the hardware, software, or variable costs were the subject of service rates approved by the Missouri Public Service Commission in a tariff or interconnection agreement. The first preference of Rule 901 was not applicable.

Second Preference for direct assignment

The second preference required costs to be "directly assigned to either regulated or nonregulated activities whenever possible". Chariton Valley identified \$170,439.33 and \$165,498.73 respectively, in costs that could be directly assigned to a specific regulated or nonregulated activity (highlighted in green on tab "Comp Services Sep 04" and tab "Comp Services July 05" of Attachment 4.)

For example only CVWS, a CMRS or wireless service provider, utilized Omnia Software Wireless. The entire annual cost was assigned to the wireless activity.

Similarly, direct assignment of costs was utilized for the following costs, as they were utilized by only one activity, either regulated or nonregulated: Hardware items CVCMP LAN Columbia and Jefferson City, Software items Glenayre Paging Interface, ISP Software/Provisioning, CLEC Provisioning, GSM Provisioning, E-Group, GEO and Custom Programming, and Variable Costs of Special Circuits T-1's.

Common Costs

Costs which cannot be directly assigned to either regulated or non-regulated activities are considered common costs. Rule 901 requires common costs to be grouped into homogeneous cost categories designed to facilitate the proper allocation of costs between a carrier's regulated and non-regulated activities. Chariton Valley's cost categories set forth in tabs "Comp Services Sep 04" and tab "Comp Services July 05" of Attachment 4 were accepted by GT and USAC.

Each homogenous cost category is then to be allocated between regulated and non-regulated activities in accordance with the remaining hierarchy set forth in subpart 3 of Rule 901, subsection (i) of which states:

"(i.) Whenever possible, common cost categories are to be allocated based upon direct analysis of the origin of cost themselves."

Third Preference for direct analysis of the origin of common costs

The remaining cost categories after exercise of the Second Preference are highlighted in yellow and blue on tab "Comp Services Sep 04" and tab "Comp Services July 05" of Attachment 4.

The Third Preference required allocation to be based upon direct analysis of origin of the costs, whenever possible. (emphasis by underlining added). “Possible” means something that conceivably can be accomplished; it is within the limits of ability. The words “whenever possible” set forth mandatory instruction from the FCC to utilize a rational method of direct analysis of the origin of costs. It is only where a rational method is “not possible” that Rule 901 permits resort to the fourth preference--the indirect, cost-causative “linkage”.

USAC rejected Chariton Valley’s allocation because revenue and net income are not appropriate cost “drivers” to allocate computer service expense. Instead of evaluating whether Chariton Valley’s allocation was a possible or rational analysis of direct cost origin, USAC and GT focused upon “drivers”, a concept not articulated in Rule 901 under any preference or principle embodied by Rule 901.

Chariton Valley did comply with the third preference. Chariton Valley did utilize a possible and rational analysis of the origin of these costs. As a first step, Chariton Valley assigned these costs only to each affiliate utilizing them, a most obvious recognition of the source or origin.

The second aspect of considering cost origin was to consider the purpose of the computer service costs at issue. These costs were incurred to generate end user and carrier access billings. Chariton Valley used a combination of the number of subscribers to be billed, the quantity of revenue generated by sending the bill, and the dollar volume of transactions recorded (Net Income,) as the best and most accurate indicators of the sources or origination of the computer services costs. These factors were a possible and rational allocation based upon direct analysis of the origin of the costs.

Chariton Valley's allocation went further, and assured the analysis of origin would not be skewed by losses. Chariton Valley recognized that the use of Net Losses to income would skew the allocation, as income after expenses could be zero, thus producing no allocation to an activity that did originate the costs. Chariton Valley therefore set a floor of \$0 for Net Income/Loss in the calculation of the allocation percentages, so a net loss could not create a negative allocation. Had Chariton Valley not set the floor, the costs assigned to the regulated company would have increased.

Similarly, Chariton Valley used a combination of Subscribers, Revenue, and Net Income (Revenue, Expenses and Other Increases/Decreases to Income,) to calculate an allocation percentage for the cost categories highlighted in yellow on Comp Services Sep 04" and tab "Comp Services July 05" of Attachment 4.

Finally, Chariton Valley applied the same origin of cost rationale for the Oasis Workstation and Software, but only allocated those costs to the two companies that used that platform. Those amounts totaled \$28,383.27 for both periods, as highlighted in blue on "Comp Services Sep 04" and tab "Comp Services July 05" of Attachment 4.

Fourth Preference, indirect cost-causative linkage to another cost category

After application of preferences two and three, the only cost category for which Chariton Valley could not find a rational direct analysis of cost origin was the Omnia/Solomon cost and ROI. (highlighted in pink on Tabs 2 and 3 of Attachment 4). The Omnia/Solomon is financial software used by all affiliates. Because its use was not driven by the need to create bills for revenue generation bills, Chariton Valley believed this cost category should be indirectly linked to another cost category.

Therefore, Chariton Valley applied Rule 901 Allocation of Costs (3)(ii), which provides:

“When direct analysis is not possible, common cost categories shall be allocated based upon an indirect, cost-causative linkage to another cost category (or group of cost categories) for which a direct assignment or allocation is available.”

Chariton Valley chose to indirectly link the percentage of software assigned to each affiliate as the cost-causative linkage for the Omnia/Solomon financial software.

The ROI was linked to the total of all hardware, software and variable costs.

Fifth Preference, when neither direct nor indirect measures of cost allocation can be found, cost shall be allocated based upon a general allocator computed by using the ratio of all expenses direct assigned or attributed to regulated and nonregulated activities.

The Fifth Preference of Rule 901 provides:

(iii) When neither direct nor indirect measures of cost allocation can be found, the cost category shall be allocated based upon a general allocator computed by using the ratio of all expenses directly assigned or attributed to regulated and nonregulated activities.

Chariton Valley’s utilization of preferences two, three, and four, as set forth above, obviated the need to utilize the Fifth Preference. All costs were allocated by Chariton Valley based upon direct or indirect analysis of cost origin, as the Rule requires. Chariton Valley’s allocation did not attempt to rely a “general allocator” of the Fifth Preference.

The Fifth Preference is only to be used when neither direct nor indirect measures can be found. When neither can be found the Fifth Preference permits a general allocator of a cost category using the ratio of all expenses directly assigned or attributed to regulated and non-regulated activities.

GT and USAC's erroneous application of the Fifth Preference

As it requires use of “the” ratio of all expenses “directly assigned or attributable”, a prerequisite of the Fifth Preference is proper application of preferences One through Four. Only when Preferences One through Four are known and applied can the “ratio of all expenses directly assigned or attributable” to regulated and unregulated activities be computed. Preferences One through Four must be correctly done in order for Preference Five to be correctly done. This is where GT’s reallocation, adopted by USAC, fails the requirements of Rule 901.

Looking at tabs “Jan 05 – Jun 05” and “July 05 – Dec 06” of Attachment 4, GT reallocated Chariton Valley’s allocation utilizing each affiliate’s proportion of “the total expenses as calculated by GT”. See the columns and rows of these tabs highlighted in blue. This was clearly an attempt to apply the Fifth Preference to all the computer service costs in question.

But nowhere does GT or USAC find that Chariton Valley’s application of the Second, Third, or Fourth Preferences was in error. Without such a finding USAC is not justified in rejecting Chariton Valley’s allocation. Nowhere does GT or USAC find Chariton Valley’s Preference Two direct assignments were wrong. Chariton Valley’s Preference Three allocation of common costs based upon direct analysis of cost origin was not found to be “impossible”. Chariton Valley’s Fourth Preference indirect assignment based upon cost-causative linkage was not explained to be in error.

Furthermore, without finding which and how much costs were not properly assigned under the Second, Third, or Fourth Preferences, GT and USAC were not

justified in applying a Fifth Preference general allocator. Rule 901 permits general allocations only when neither direct nor indirect measures can be found.

Conclusion

In summary, GT and USAC's findings constitute a case of non-specific second guessing. Chariton Valley was charged with making the allocations pursuant to Rule 901. GT and USAC were only called upon to review Chariton Valley's allocation by virtue of an audit. The potential result of this audit was to take from Chariton Valley moneys previously paid. With this potential at stake, minimum due process requirements called for GT and USAC to specify wherein and why Chariton Valley's allocations were in error, and to demonstrate a reallocation properly applying the Rule. They failed to do so, and in the process demonstrated their lack of familiarity with Rule 901.

Chariton Valley and its separations/cost consultants have extensive background and experience in allocating costs of computer systems used in the communications business. Cost allocations for all costs, including computer service costs, are reviewed and revised annually by Chariton Valley.

Chariton Valley's allocation spreadsheet, which utilized terms such as "revenue" and "net income", utilized those terms in order to directly identify the origin of the costs. They were not used as an indirect allocator, as USAC concluded. When Chariton Valley did use an indirect allocator, it was based upon cost-causative linkage to another cost category, as required under the Fourth Preference.

It was Chariton Valley's perception that GT did not have a history auditing small rural phone companies and were not familiar with our costs, or the origins of our costs.

GT did not appear to understand the costs being allocated. GT did not apply the principles of Rule 901 as closely as Chariton Valley had. Chariton Valley had costs in the hardware, software and support allocation that had specific origins of cost that could be analyzed. Chariton Valley also had common costs where a direct analysis and measurement could be done as to the origin of those costs.

GT did not separate those and put all remaining costs into the Fifth Preference general allocator. GT did not correctly follow Rule 901 when it skipped to Fifth Preference general allocator. It is also CVs opinion that GT did not use an appropriate cost category for the cost-causative linkage. GT merely took total expenses for each company and assumed that to be a cost-causative linkage. There is no linkage between overall company expenses and the expense to print bills and post transactions. One example that proves this linkage does not necessarily exist is depreciation expense. If one company's plant is fully depreciated, it will get a smaller portion of computer service cost allocation, even though it may have the most customers and generate the largest number of bills.

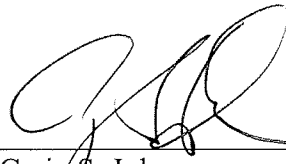
CV does not agree with GT analysis of the origin of costs, direct cost attribution, indirect cost attribution, or GTs resort to a Fifth Preference general allocation.

Neither the auditor nor USAC should be granted the discretion to ignore Rule 901 in seeking recoveries. USAC should only be permitted to disturb a company's allocation if the auditor establishes how Rule 901 was violated, and if the auditor establishes a correct allocation properly applying the hierarchy of Rule 901. Anything less would amount to a taking of property without due process of law. Equally important, anything

less denigrates the status of Commission Rule 901 from a mandatory rule to a policy
auditors and USAC are free to ignore.

Statement of Relief Sought

Wherefore, on the basis of the foregoing, Chariton Valley respectfully requests
the Commission to reverse the decision of the Administrator to recover USF amounts
associated with the above-referenced costs.



Craig S. Johnson
Mo Bar # 28179
Johnson & Sporleder, LLP
304 E. High St., Suite 200
P.O. Box 1670
Jefferson City, MO 65102
(573) 659-8734
(573) 761-3587 FAX
cj@cjaslaw.com

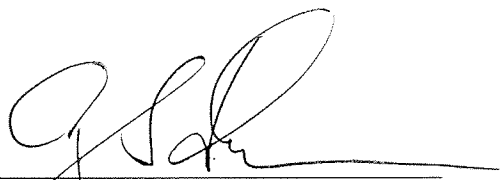
Certificate of Service

The undersigned hereby certifies that, on the 10th day of December, 2012, a copy of the foregoing Request for Review by Chariton Valley Telephone Corporation of a Decision of the Universal Service Administrator was served upon the Administrator of the Universal Service Administration by placing in the US Mail, postage prepaid, to the following:

High Cost and Lifeline
Universal Service Administrative Company
Attention: Karen Majcher
2000 L Street NW, Suite 200
Washington, DC 20036

and also was served upon the Administrator of the Universal Service Administration by electronic mail sent to the following email address:

HCLI-IndustrySupport@usac.org



Craig S. Johnson